

No. 15-1289

**IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

NATIONAL LABOR RELATIONS BOARD,	:	
	:	
	:	
Petitioner,	:	
	:	NLRB 05CB114849
v.	:	NLRB 05CB112215
	:	
	:	
NATIONAL UNION UNITED SECURITY & POLICE OFFICERS OF AMERICA,	:	
	:	
	:	
Respondent.	:	

CONSENT MOTION TO EXTEND BRIEFING SCHEDULE

Respondent, United Security & Police Officers of America (“USPOA”), with the consent of Petitioner and the Court-assigned mediators, respectfully requests that the Court extend the briefing schedule in the above-styled matter for fourteen (14) days and as grounds, Respondent states as follows:

1. The Parties agreed to participate in mediation and have engaged in discussions since December 2016. The Parties believe that resolution is likely to be reached. The Board, however, requires additional time to review records which Respondent was only able to provide April 29, 2016.
2. Respondent’s brief, (the opening brief in cases filed pursuant to Fed.R.App.P. 15) is due May 2, 2016.

3. The Parties require additional time to conclude discussions and to fashion and execute an appropriate resolution agreement assuming their final communications will result in the anticipated settlement.

4. The Parties expect that mediation will conclude on or before May 6, 2016.

5. The National Labor Relations Board and the mediators (Stephen Pollack and William Marmon) consent to the relief requested.

6. The instant motion is the Respondent's third and final request. Neither Party will be prejudiced by the relief requested.

Accordingly, Respondent respectfully requests that the Court extend the deadline in which to file the opening brief for fourteen (14) days, up to and including May 16, 2016.

Respectfully submitted:

April 29, 2016

/s/Eden Brown Gaines

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CERTIFICATE OF SERVICE

I do hereby certify that a copy of Consent Motion to Extend Briefing Deadline was served via the Electronic Case Filing System this 29th day of April, 2016 upon the following:

Linda Dreeben
David Seid
National Labor Relations Board
1015 Half Street, SE
Washington, DC 20570

/s/ Eden Brown Gaines
Eden Brown Gaines